

1R - 427-375

REPORTS

DATE:

4-10-12

1R427-375

RECEIVED OGD

2012 MAY -1 P 1:51

EME H-36 EOL
2011

CLOSURE

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

May 1, 2012

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Termination Request
EME H-36 EOL: UL/H, Sec. 36, T19S, R36E
RICE Operating Company – Eunice Monument Eumont SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the EME Saltwater Disposal (SWD) System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Background

In 2011, ROC initiated work on the former H-36 EOL junction box. The site is located in UL/H, Sec. 36, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 36 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x6-ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of <16 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 28.9 mg/kg. The excavated soil was returned to the excavation and contoured to the surrounding area. On 8/9/2011, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. The junction box final report, photo documentation, laboratory analysis, PID sheet, chloride graph and revegetation form are attached.

Recommendations

Site investigation demonstrates that residual chloride and hydrocarbons in the vadose zone will not with reasonable probability contaminate groundwater in excess of NMOCD

standards. This site meets the requirements of the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). As such, ROC request termination of the regulatory file, or similar closure status.

Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read 'H. Conder', with a stylized flourish at the end.

Hack Conder
Environmental Manager

enclosures

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Eunice Monument Eumont (EME)	H-36 EOL	H	36	19S	36E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater 36 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 8/5/2011 Date Completed 8/9/2011 OCD Witness No

Soil Excavated 4.7 cubic yards Excavation Length 3 Width 7 Depth 6 feet

Soil Disposed None cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 8/5/2011 Sample Depth 6'

TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 6' GRAB	1.1	<10.0	28.9	<16

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	148
vertical delineation trench at the junction (source)	2'	154
	3'	146
	4'	124
	5'	151
	6'	141

General Description of Remedial Action: This junction and line were eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals creating a 7X3X6-ft. deep excavation. Chloride field tests performed on each sample yielded concentrations similar to that of the background sample. Organic vapors were measured using a PID, which yielded low concentrations. The deepest sample, 6 ft. BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. The excavation was backfilled with excavated soil to ground surface and contoured to the surrounding area. On 8/9/2011, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

enclosures: photos, lab results, PID (field) screenings, chloride graph, revegetation form

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR Kyle Norman SIGNATURE Kyle No

REPORT ASSEMBLED BY Laura Peña SIGNATURE Laura Peña COMPANY RICE OPERATING COMPANY

PROJECT LEADER Zach Conder SIGNATURE Zach Conder DATE 4-10-12

EME H-36 EOL

Unit H, Section 36, T19S, R36E



Collecting sample, facing west

8.5.11



Final excavating, facing west

8.5.11



Spreading seed, facing north

8.9.11



Site complete, facing north

8.9.11



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

August 12, 2011

Hack Conder
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: EME H-36 EOL (19/36)

Enclosed are the results of analyses for samples received by the laboratory on 08/05/11 16:03.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene
Lab Director/Quality Manager

COPY

Analytical Results For:

 Rice Operating Company
 Hack Conder
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

 Received: 08/05/2011
 Reported: 08/12/2011
 Project Name: EME H-36 EOL (19/36)
 Project Number: NONE
 Project Location: NONE GIVEN

 Sampling Date: 08/05/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: INITIALS @ 6' (H101645-01)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/08/2011	ND	432	108	400	7.14	
TPH 8015M			mg/kg		Analyzed By: ab				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/11/2011	ND	161	80.3	200	1.10	
DRO >C10-C28	28.9	10.0	08/11/2011	ND	148	73.9	200	1.09	

Surrogate: 1-Chlorooctane 76.4 % 70-130

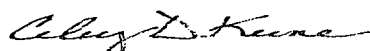
Surrogate: 1-Chlorooctadecane 81.4 % 70-130



Cardinal Laboratories

*=Accredited Analyte

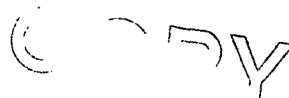
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

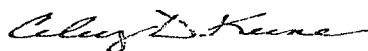
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report



Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(505) 393-2326 FAX (505) 393-2476

[illegible]

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence, and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: <i>Kyl N</i>		Date: <i>8-5-11</i>	Received By: <i>Jodi Benson</i>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:
		Time: <i>4:03</i>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:
Relinquished By:		Date:	Received By:	REMARKS:
		Time:		<i>hconder@rice.swd.com</i>
				<i>Lweanheimer@rice.swd.com</i>
				<i>zconder@rice-ecs.com</i>
				<i>bbaker@rice.swd.com</i>
				<i>kjones@riceswd.com</i>
				<i>Knorman@rice-ecs.com</i>
Delivered By: (Circle One)		Sample Condition		CHECKED BY:
Sampler - UPS - Bus - Other:		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		(Initials)
		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No		<i>JS</i>

RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240

PHONE: (505) 393-9174 FAX: (505) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

CK.		MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL	x	MODEL: PGM 7300	SERIAL NO: 590-000504
NO.		MODEL: PGM 7320	SERIAL NO: 592-903318
		MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 930360	EXPIRATION DATE: 5/24/2013
METER READING ACCURACY: 99.9 PPM	

ACCURACY : +/- 2%

COMPANY

Rice

SITE	UNIT	SECTION	TOWN SHIP	RANGE
EME H-36 EOL	H	36	19S	36E

SAMPLE ID	PID	SAMPLE ID	PID
Back Ground @ 6"	0.6		
Initials @ 2'	1.4		
Initials @ 3'	1		
Initials @ 4'	1.6		
Initials @ 5'	4.3		
Initials @ 6'	1.1		
		COPY	

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE: Kyle N...

DATE: 8/5/2011

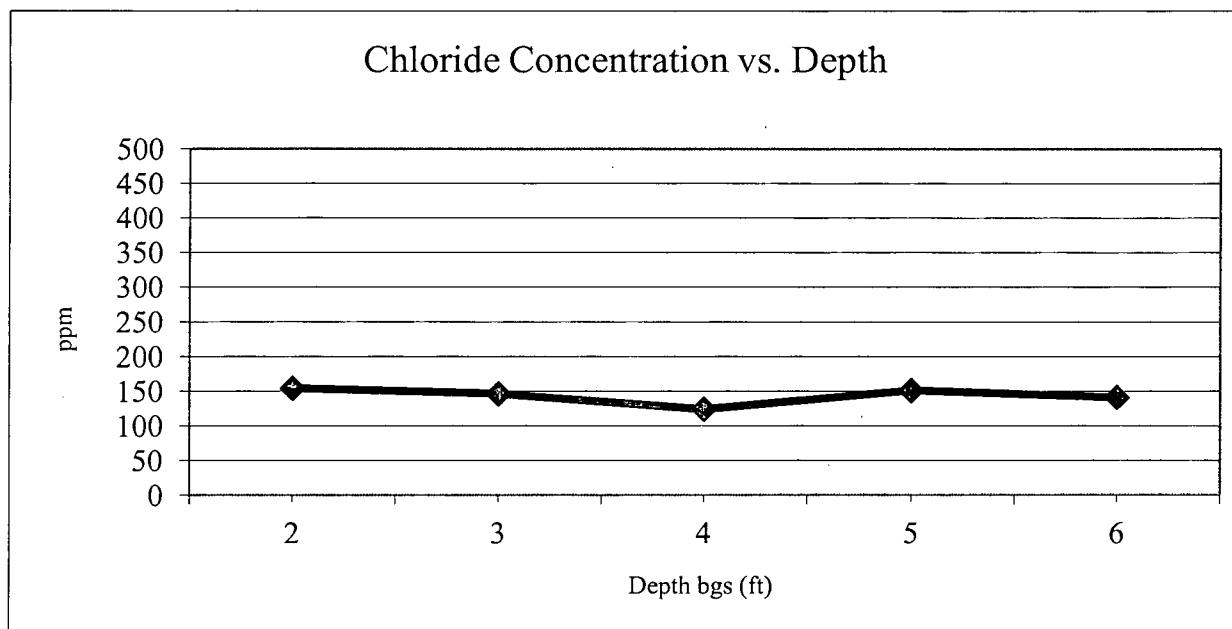
EME H-36 EOL

Unit 'H', Sec. 36, T19S, R36E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
2	154
3	146
4	124
5	151
6	141

Groundwater = 36 ft





PO Box 5630
Hobbs, NM 88241
Phone: (575) 393-4411
Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: EME H-36 EOL						
U/L H	Section 36	Township 19S	Range 36E	County Lea	Latitude W. 103° 18.183'	Longitude N. 32° 37.228'
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size: 1,064 square feet			Map detail of site attached <input type="checkbox"/>			
Additional information:						

2. Soils

**Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):
Texture:		Describe soil & subsoil:		
Soil prep methods:	Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):
Rollerpack <input type="checkbox"/>				
Date completed: 8/9/2011				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type:	Describe:	
Lbs/acre:		

4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: Dooms Mix	Seeding date: 8/9/2011
Broadcast <input checked="" type="checkbox"/>			
Method: By Hand			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations:		
Number of photos:			

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Kyle Norman	Title: Environmental Tech	Date: 8/9/2011
Signature: 